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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF JOINT SUBMISSION RE:
GOOGLE PRIVILEGE LOG DISPUTE**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s
7 Administrative Motion to Seal portions of the parties’ Joint Submission Re: Google Privilege Log
8 Dispute (“Joint Submission”). In making this request, Google has carefully considered the relevant
9 legal standard and policy considerations outlined in Civil Local Rule 79-5. Google makes this
10 request with the good faith belief that the information sought to be sealed consists of Google’s
11 confidential and proprietary information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Joint
13 Submission, attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential and
15 proprietary information regarding highly sensitive features of Google’s internal systems and
16 operations, including details related to internal identifiers and projects, and their proprietary
17 functions, which Google maintains as confidential in the ordinary course of its business and is not
18 generally known to the public or Google’s competitors.

19 5. Such confidential and proprietary information reveals Google’s internal strategies,
20 system designs, and business practices for operating and maintaining many of its important services,
21 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-
22 3.

23 6. Public disclosure of such confidential and proprietary information could affect
24 Google’s competitive standing as competitors may alter their internal identifier system designs and
25 practices relating to competing products. It may also place Google at an increased risk of cyber
26 security threats, as third parties may seek to use the information to compromise Google’s internal
27 identifier system, projects, and practices.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed in San Francisco, California on October 18, 2021.

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

Attorney for Defendant